

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF  
JESSICA DAVIDSON  
MILLER, ESQ.**

JESSICA DAVIDSON MILLER, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively, “the ZHP Defendants”). I make this Certification based on personal knowledge and in support of the ZHP Defendants’ Memorandum of Law in Support of Motion to Compel Materials in the Possession of Third Party Valisure LLC.

2. Attached hereto collectively as Exhibit 1 are true and accurate copies of the relevant excerpts from the Expert Report of Laura M. Plunkett, Ph.D., DABT, October 31, 2022; Expert Report of Susan Bain, DRSc, October 31, 2022; and Expert Report of Ramin (Ron) Najafi, Ph.D., October 31, 2022, all served in MDL 2875.

3. Attached hereto as Exhibit 2 is a true and accurate copy of the ZHP Defendants' Notice of Subpoena, Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, and Attachment A thereto, dated December 14, 2022.

4. Attached hereto as Exhibit 3 is a true and accurate copy of a December 21, 2022 email from Conlee S. Whiteley to Christopher J. Santoli.

5. Attached hereto as Exhibit 4 is a true and accurate copy of Valisure's Objection Letter, dated December 26, 2022.

Respectfully submitted,

*/s/ Jessica Davidson Miller*  
Jessica Davidson Miller (DC Bar No.  
457021)  
*Liaison Counsel for Manufacturer*  
*Defendants*  
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*Attorneys for Zhejiang Huahai*  
*Pharmaceutical Co., Ltd., Huahai U.S., Inc.,*  
*Prinston Pharmaceutical Inc., and Solco*  
*Healthcare U.S., LLC*

Dated: January 4, 2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 4, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ *Jessica Davidson Miller*

Jessica Davidson Miller (DC Bar No.  
457021)